

August 1, 2008

VIA HAND DELIVERY

Ms. Amanda Stone
Waste Programs Division Director
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: *Comments on Revised Draft Solid Waste Rules*

Dear Amanda:

On behalf of the Solid Waste Coalition ("Coalition"), we submit the following comments on the Arizona Department of Environmental Quality's ("ADEQ's") draft solid waste rules. The Solid Waste Coalition consists of representatives of cities, counties, waste management companies, waste associations, consultants and trade groups that have significant interests in the regulation of solid waste in Arizona. Coalition members have participated in the ADEQ's stakeholder process from its inception, and the Coalition has previously provided ADEQ comments related to the September 2007 version of the draft solid waste rules.

The Coalition's comments are comprised of this letter, the enclosed redline of ADEQ's July 7, 2008 version of the draft rules reflecting revisions that the Coalition requests ADEQ to consider in moving forward developing a solid waste rule package, and the enclosed comments describing the Coalitions rationale for the proposed revisions. The enclosed comments describing the Coalition's rationale for the suggested changes are divided into two sections; the first section contains general comments regarding the scope and breadth of certain regulatory requirements that have application in several Articles in the draft rules, and the second section describes specific revisions identified by the affected section.

As a preliminary matter, given the number of revision to the draft rules that ADEQ identified would be made to the draft rules during the stakeholder meetings on July 14th and 15th combined with number of revisions the Coalition is requesting, we believe that it is imperative that ADEQ provide an opportunity for the affected stakeholders to review and provide additional comments on the draft rules prior to proceeding to formal rulemaking. The Coalition has been actively involved in the rulemaking process and has provided ADEQ with comments to develop an effective rule package. Since it distributed the first version of the draft solid waste rules to

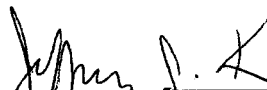
stakeholders in September 2007, ADEQ made significant revisions to both the structure and substance of the draft rules and distributed a revised draft in early June 2008. A second revision of the draft rules was distributed to stakeholders in early July. Given the substantial revisions to the draft rules and the ADEQ's own revisions and the short time frame in which the stakeholders have to review the revisions and submit comments, ADEQ should provide the stakeholders an opportunity to review and comment on the draft rules after the agency considers the comments submitted to the Agency by August 1, 2008 related to the July 7, 2008 revision. This way, ADEQ can ensure the rule package submitted to Secretary of State for publication in the Arizona Register as a proposal will represent a product fully considered by the interested parties and will not result in any unintended consequences.

Again, the Coalition is committed to working with ADEQ to develop a solid waste rule package that is consistent with the Agency's statutory mandate and that the regulated community can implement. The Coalition sincerely appreciates ADEQ's continued collaboration with the affected stakeholders in developing this solid waste rule package and the Agency's consideration of these comments. If you have any questions or concerns regarding these comments, please do not hesitate to contact David Wallis at 602-530-8136.

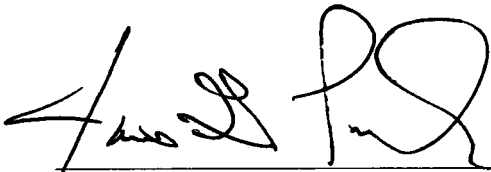
Very truly yours,



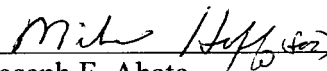
David L. Wallis, Chair
Solid Waste Coalition



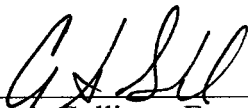
Jeff Kros, Legislative Director
League of Arizona Cities and Towns



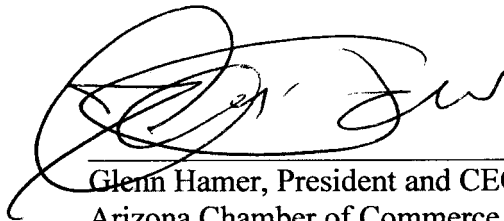
James G. Peck, Legislative Liaison
Arizona Chapter of the Solid Waste
Association of North America



Joseph F. Abate
Arizona Chapter of the National
Solid Wastes Management Association



Craig A. Sullivan, Executive Director
County Supervisors Association of
Arizona



Glenn Hamer, President and CEO
Arizona Chamber of Commerce and
Industries